

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Melissa Bennett, Administrator of the Estate of Scott Anthony Coldren	:	Case No. 2:20-cv-03193
	:	
Plaintiff,	:	Judge James L. Graham
	:	Magistrate Judge Chelsey M. Vascura
v.	:	
	:	
George W. Lavender, <i>et al.</i> ,	:	
	:	
Defendants.	:	

STIPULATION OF EXTENSION OF TIME TO MOVE OR PLEAD

It is hereby stipulated and agreed, by and between the parties and/or their respective counsel, that Defendant George W. Lavender be permitted an extension of time, until August 7, 2020, to move or plead in response to Plaintiff's Complaint (Doc. 2, PageID#3-8). The stipulated extension is authorized pursuant to Fed. R. Civ. P. 6(b)(1)(A) and S.D. Ohio Civ. R. 6.1(a). Furthermore, the extension is supported by good cause, as defense counsel needs additional time to meet with their client and prepare a proper response to Plaintiff's Complaint, and the extension is not sought for purposes of delay. Accordingly, Defendant George W. Lavender will move or plead in response to Plaintiff's Complaint on or before August 7, 2020.

Respectfully submitted,

By:

s/ Daniel T. Downey
Daniel T. Downey (0063753)
Angelica M. Jarmusz (0092249)
Fishel Downey Albrecht & Riepenhoff LLP
7775 Walton Pkwy, Suite 200
New Albany, Ohio 43054
(614) 221-1216 – Telephone
(614) 221-8769 – Fax
ddowney@fisheldowney.com
ajarmusz@fisheldowney.com
Attorneys for Defendant George W. Lavender

s/ M. Sean Dingus (per 7/3/2020 email auth.)
M. Sean Dingus (0070201)
Adam Morris (0096754)
PLYMALE AND DINGUS LLC
136 W. Mound St.
Columbus, Ohio 43215
(614) 542-0220 - Telephone
(614) 542-0230 – Fax
sdingus@dinguslaw.com
amorris@dinguslaw.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the *Stipulation of Extension of Time to Move or Plead* was served this 7th day of July 2020 through the Court's electronic filing system.

s/ Daniel T. Downey
Daniel T. Downey (0063753)
FISHEL DOWNEY ALBRECHT & RIEPENHOFF LLP
Attorney for Defendant George W. Lavender

CORSA Litigation\Ross\Coldren\Pleadings - Word Docs\07-20 Stipulation of Extension